

III. REMARKS

Status of the Claims

Claims 2,4-7,9,10,12,14-19 are amended. Claims 1,3,8,11,13,20, and 21 are cancelled without prejudice . Claims 23-26 are added. Claims 2,4-7,9,10,12,14-19,and 22-26 are presented for consideration.

Summary of the Office Action

Claims 1,8,9,11,20, and 21 stand rejected under 35USC102(e) on the basis of the cited reference Kunde et al, U.S. Patent No. 6,178,410. Claims 5-,15,17, and 19 stand rejected under 35USC103(a) based on the reference Kunde in view of the cited reference Sutherland,et al, U.S. Patent No. 6,609,117. Claims 2-4,10,12-14, and 22 stand rejected under 35USC103(a) based on the reference Kunde in view of the cited reference Yeung, et al, U.S. Patent No. 6,101,487. The Examiner is respectfully requested to reconsider his rejection in view of the above amendments and the following remarks.

It is believed that the Examiner's objection to claims 16 and 18 under 35USC112 are fully met by the amendments submitted above.

Discussion of the Cited Reference

The Examiner relies on the reference Kunde to support the rejection based on anticipation and as primary support for the rejections based on obviousness.

The reference Kunde describes a mail processing facility in which mail processing machines are interconnected for communication through an emergency off line. Hardware and software are provided to allow each station to activate an emergency shut-off

of all stations by a an emergency signal sent over the off line from a base station. Each station is provided with an interfaces for communication with the adjacent station.

According to the claims as amended, the system of this invention comprises a series of remote postage printing stations connected to a postal service infrastructure which contains a communication server. The postal service infrastructure contains a key management system, a telemeter system, and postal and non-postal applications servers. The remote stations are routed by the communication server to the KMS, the TMS, and application servers for obtaining additional services. The server/router has multiple socket servers and socket ports associated with a service. This enables remote postage printing stations to connect for cryptographic processing and auditing and many other functions.

The system of the cited reference does not contain a plurality of remote postage printing stations connected by a centralized postal service infrastructure. The only inter connection provided for the mail handling stations of Kunde is the emergency off-line. Each of the mail handling stations is self contained and receives mail from a feeder station to be franked. There is no discussion about encryption key management nor funds auditing or transfer. No postal or other service application are available. There is no server/router constructed to provide communication to postal and non-postal services. The reference Kunde therefore, does not support the rejection based on anticipation.

The Issue of Anticipation

The Examiner is reminded that the anticipation analysis requires a positive answer to the question of whether the system of Kunde would infringe the claims of this application, if it were later. Because of the many features of the claims of this application that are not present in the system of the reference Kunde, there can be no infringement of the subject claims. Therefore the teaching of Kunde does not support the rejection based on anticipation with respect to any of the claims.

The Examiner has based the rejection of claims 5-7,15,17,and 19 for obviousness on the combined teachings of the references Kunde and Sutherland. The reference Sutherland describes a system for allowing the bulk purchase of postage by a postal customer from a post office system. The function of this system is concisely described at column 3, lines 40-51 of Sutherland as follows:

"Thus, after a postal customer system 12(n) purchases postage from the postal office system 11, it (that is, the postal customer system 12(n)) is permitted to print authentic postage indicia on items to be mailed using the postal delivery service, after which the respective postal customer can provide the respective items to the postal delivery service for mailing. The postal office system 11, after being provided with an item to be mailed by a postal customer, can scan the postage indicium printed thereon by the customer's postal customer system 12(n) to verify its authenticity and that the postage represented thereby is sufficient for the class of service to be provided in connection therewith."

The system of Sutherland accomplishes the above purposes by providing a code for application with postal indicia. This is described as follows at column 2, lines 43-57:

"When the postal customer purchases postage from the postal service, the postal service provides information which the postal customer uses to generate pseudo-random numbers associated with the respective units of postage. When the postal customer prints

an indicium for a respective unit, it appends the associated pseudo-random number, which the postal service uses to authenticate the indicium. The pseudo-random numbers are generated using a methodology by which the postal customer can generate pseudo-random numbers for units which have been purchased, but not for units which have not yet been purchased. Each indicium represents an amount of information which can be printed using a one-dimensional barcode, instead of two-dimensional barcodes required in other systems. The postal service maintains a running record of the units of postage which have been used by the postal customer, and so the postal customer cannot use a unit for more than one indicium."

The reference Sutherland is more concerned with verifying indicia than providing an extensive array of services. There is no description of a KMS server, a TMS system, or any means for providing additional postage services and non-postage services. A server/router or router function is also not disclosed. The cited reference Sutherland, therefore, does not remedy the deficiencies of the reference Kunde.

The Examiner has based the rejection of claims 2-4,10,12-14, and 22 on the combined teachings of Kunde and Yeung. The system of Yeung is primarily concerned with the establishment of a statement of mailing process to replace the need to apply postage indicia. It is also directed to establishing a billing and accounting process to support the use of a statement of mailing. Again there is no mention in the teaching of Yeung with respect to a KMS server, a TMS system, or any means for providing additional postage services and non-postage services. The cited reference Yeung, therefore, also fails to remedy the deficiencies of the reference Kunde.

The Issue of Obviousness

It is well settled that in order to establish a prima facie case for obviousness, the prior art reference (or references when

combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, without reference to the disclosure of this application.

Applicant submits that the above described deficiencies of the primary reference Kunde are not remedied by the proposed combination with the teachings of either the reference Sutherland or the reference Yeung. The combined references do not therefore support a prima-facie case of obviousness. The modification of the teachings of Kunde, Sutherland, or Yeung in order to obtain the invention, as described in the claims submitted herein, would not have been obvious to one skilled in the art.

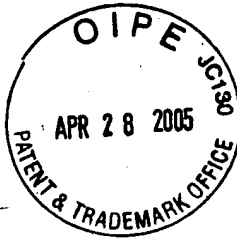
For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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